

Supporting Statement A

**Subject Matter Expert Interviews for the National Study of Long-Term Care Providers
Gaps Project**

**Generic IC:
Developmental Studies to Improve the National Health Care Surveys
OMB No. 0920-1030
(Expires October 31, 2017)**

Contact Information
Lauren Harris-Kojetin
Division of Health Care Statistics
National Center for Health Statistics
3311 Toledo Rd
Hyattsville MD 20782
301-458-4369
fti3@cdc.gov
7/27/16

A. Justification

1. Circumstances Making the Collection of Information Necessary

The National Center for Health Statistics (NCHS) received OMB approval for Developmental Studies to Improve the National Health Care Surveys Generic Clearance (OMB No. 0920-1030, EXPIRES 10/31/2017) to conduct developmental studies on survey design and data collection activities that are part of the National Health Care Surveys (NHCS).

Under this approval, OMB has agreed to expedite generic IC review of proposals for data collections and OMB will generally review such requests within ten business days.

The specific generic IC project for this clearance is to:

- Conduct interviews with 18 subject matter experts including researchers, state officials (e.g., Medicaid agencies and state regulatory offices), and staff at disability advocacy organizations and provider associations to identify: 1) gaps in the coverage of paid, regulated long-term care services providers and services users in NCHS' biennial National Study of Long-Term Care Providers (NSLTCP) and 2) ways for NCHS to consider working towards addressing these gaps in future waves of NSLTCP.

2. Purpose and Use of Information Collection

The National Study of Long-Term Care Providers (NSLTCP) (OMB No. 0920-0943, expires 05/31/2019) is a biennial initiative that produces national and state statistical information about the supply, use, and characteristics of the major sectors of paid, regulated long-term care services in the United States. NSLTCP is intended to enable efficient monitoring of the diverse field of long-term care services and to help support and inform long-term care policy, research, and practice. For the first three waves conducted between 2012 and 2016, NSLTCP has included five sectors— adult day services centers, assisted living and similar residential care communities, home health agencies, hospices, and nursing homes. For NSLTCP, NCHS uses nationally representative administrative data from the Centers for Medicare & Medicaid Services (CMS) on nursing homes and residents, home health agencies and patients, and hospices and patients; and collects primary data on residential care communities and residents and adult day services centers and their enrolled participants.

The long-term care services system in the United States has been changing over recent years. Through NSLTCP, NCHS aims to continue to provide credible, relevant and timely statistical information to monitor trends in the long-term care services industry. To meet this goal, NCHS is conducting a project to identify gaps in NSLTCP coverage (“gaps project”). The objective of the gaps project is to identify: what gaps exist in the NSLTCP coverage of the major sectors of

paid, regulated long-term care services (providers and services users) in the United States; proposed working definitions for the gaps; what data sources exist to fill these gaps; strengths and weaknesses of existing data sources to fill gaps; for what gaps no extant data exist; the feasibility of collecting primary data where no data currently exist; and, a plan for how most cost-effectively and accurately to fill identified gaps, including prioritizing which gaps to pursue first based on specified criteria (e.g., less expensive, more feasible, account for large share of currently excluded providers or users). The gaps project uses three methods to meet its objective: (1) an environmental scan, (2) subject matter expert interviews, and a (3) review of the published and grey literature. NCHS seeks clearance for this specific generic IC project to conduct the subject matter expert interviews for the gaps project.

The purpose of the information collected through the subject matter expert interviews is to enable NCHS to identify 1) gaps in the coverage of paid, regulated long-term care services providers and service users currently included in NSLTCP—e.g., to identify emerging provider sectors not currently included in NSLTCP or portions of current NSLTCP sectors excluded or under-represented and 2) ways for NCHS to consider working towards addressing these gaps in future waves of the biennial NSLTCP. Information from the subject matter expert interviews will be used to help identify gaps that remain in NSLTCP’s coverage of paid, regulated long-term care service providers and services users in the United States, with the results used to inform and improve the design of future NSLTCP waves.

The information will be collected from 18 subject matter experts via telephone interviews. These individuals will be purposively selected to include researchers and staff at disability advocacy organizations and provider associations as well as state officials (e.g., Medicaid agencies and state regulatory offices). The subject matter experts are being identified because they represent organizations or agencies that, based on knowledge of the project team, are generally recognized as pertinent to long-term care service provision in the United States. These organizations or agencies fall into one of the following categories: represent populations that receive long-term care services; represent paid, regulated provider of long-term care services; or, regulate at the state level providers of long-term care services. The subject matter experts will also include researchers who have recognized expertise in paid, regulated long-term care services provision, as identified by the project team. Email addresses for subject matter experts will be obtained from the websites of the agencies or organizations or from personal knowledge by project team members.

There are two versions of the interview, one for researchers and representatives of disability advocacy organizations and provider associations that we intend to complete with 10 subject matter experts, and the other for state agency staff that we intend to complete with 8 subject matter experts. This 10/8 distribution goal is because the researcher/disability advocacy organizations/provider associations represent a more diverse set of entities, whereas we expect to be able to represent the diversity among the state agencies with 8 states.

Each of the 18 interviews will include two project team members; one to conduct the interview and another to take notes and to contribute to the discussion.

3. Use of Improved Information Technology and Burden Reduction

An advanced information letter will be emailed to each subject matter expert we seek to interview, followed by a telephone call to verify correct email and telephone contact information, to obtain consent to do the interview, and to schedule the interview; interviews will be conducted by telephone at a time convenient to each subject matter expert.

4. Efforts to Identify Duplication and Use of Similar Information

There are no current studies examining gaps in NSLTCP coverage.

5. Impact on Small Businesses or Other Small Entities

Subject matter experts will include researchers, state officials (e.g., Medicaid agencies and state regulatory offices), and staff at disability advocacy organizations and provider associations. Although we do not believe that any of the disability advocacy organizations or provider associations are small businesses, if any of them are, they should not be adversely affected by the subject matter interviews. In order to minimize burden on all subject matter experts, the number of items contained in the interview protocol has purposely been held to the minimum required.

6. Consequences of Collecting the Information Less Frequently

This is a request for clearance to allow NCHS to conduct the subject matter interviews as part of the gaps project one time.

7. Special Circumstances Related to the Guidelines of 5CFR 1320.5

Data from these subject matter expert interviews will be used by NCHS to inform planning for future waves of NSLTCP, but the results cannot be generalized to the universe of study.

8. Comments in Response to the Federal Register Notice and Efforts to Consult Outside Agency

a. Federal Register Notice

In compliance with 5 CFR 1320.8(d), a 60-day Federal Register notice was published in the Federal Register on April 30, 2014, Volume 79, Number 83 pages 24435-36 . There were no public comments received as a result of this notice.

b. Consultation

Only internal consultation was involved in this project.

9. Explanation of Any Payment or Gift to Respondents

No payment or gift will be offered to the subject matter experts.

10. Protection of the Privacy and Confidentiality of Information Provided to Respondents

It has been determined that the Privacy Act does not apply to this request. The subject matter expert interviews will not collect identifiable private information about the subject matter experts (researchers, state officials, association staff). Instead, the interviews will collect information on the subject matter experts' professional insights about NSLTCP, its gaps in coverage, and how to address those gaps.

Confidentiality will be provided to respondents as assured by Section 308(d) of the Public Health Service Act (42 USC 242m) as follows:

“No information, if an establishment or person supplying the information or described in it is identifiable, obtained in the course of activities undertaken or supported under section 304, 306, or 307 may be used for any purpose other than the purpose for which it was supplied unless such establishment or person has consented (as determined under regulations of the Secretary) to its use for such other purpose and in the case of information obtained in the course of health statistical or epidemiological activities under section 304 or 306, such information may not be published or released in other form if the particular establishment or person supplying the information or described in it is identifiable unless such establishment or person has consented (as determined under regulations of the Secretary) to its publication or release in other form.”

Data will be treated in a confidential manner. The process of informing subject matter experts of the procedures used to keep information confidential begins with material mailed in advance and carries through to interviewer training and all communications with potential subject matter expert respondents.

NCHS and subcontractor staff routinely employ technical, physical, and administrative measures to secure information and safeguard privacy and confidentiality. These include:

- when confidential materials are moved between locations, records are maintained to insure that there is no loss in transit,
- hard copies of confidential information are stored in secure areas when not in use,
- access to the data processing and storage areas is controlled, with only authorized personnel allowed in secure locations,
- individual data files are protected by passwords and other techniques, which prohibit access by non-approved project staff ,
- building security forces are on duty 24 hours, seven days per week at all sites,

- access to nonpublic data is restricted to those who must have such access.

Interviewers, supervisors, and staff receive thorough training on legal and ethical obligations. All employees and contract staff sign an Affidavit of Nondisclosure as a condition of employment.

11. Institutional Review Board (IRB) and Justification for Sensitive Questions

This data collection effort is deemed not human subjects research (Attachment A).

There are no sensitive items included in this survey.

12. Estimates of Annualized Burden Hours and Costs

Subject matter interviews will be conducted with a total of 18 researchers, representatives of disability advocacy organizations and provider associations, and state agency staff (e.g., Medicaid agencies and state regulatory offices). The subject matter interview protocol includes an introductory email and up to two telephone calls per eligible, participating respondent. After the introductory email (Attachment B) is sent, the first call, to schedule the interview, will take on average 5 minutes (Attachments C-1 and C-2). There are two versions of the script to schedule the interview (version A in Attachment C-1 and version B in Attachment C-2): version A is for subject matter experts that respond to the introductory email and agree to participate in the interview, but prefer to schedule the interview by telephone; version B is for subject matter experts that do not respond to the introductory email. The second call, to conduct the interview, will take on average 60 minutes (Attachments D-1 and D-2). There are two versions of the interview (version A in Attachment D-1 and version B in Attachment D-2), one for researchers and representatives of disability advocacy organizations and provider associations that will be completed with 10 participants, and the other for state agency staff that will be completed with 8 participants. Each subject matter expert will get only one version of the script to schedule the interview (either A or B) and the interview (either A or B). The version each subject matter expert gets is appropriate to their situation (i.e., whether or not they responded to the email and the type of organization they represent). Both the scheduling calls and subject matter interviews are estimated to take no more than 65 minutes per respondent for a total burden of 20 hours (see Table 1).

The average cost to subject matter experts is estimated to be \$ 1019.80 (see Table 2). The hourly wage estimates for completing the interviews mentioned in the burden hours table are based on information from the Bureau of Labor Statistics web site (<http://www.bls.gov>). Specifically, we used the "May 2015 National Occupational Employment and Wage Estimates" for Medical and Health Services Managers.

Table 1. Estimate of Annualized Burden Hours

Type of Respondent	Form Name	Number of Respondents	Number of Responses	Average Burden/Response (in hours)	Response Burden (in hours)
Researchers and representatives of disability advocacy organizations and provider associations	Scheduling Call Script A	10	1	5/60	1
State agency staff	Scheduling Call Script B	8	1	5/60	1
Researchers and representatives of disability advocacy organizations and provider associations	Interview A	10	1	1	10
State agency staff	Interview B	8	1	1	8
Total					20

Table 2. Estimate of Annualized Burden Costs

Type of Respondent	Form Name	Total Burden Hours	Hourly Wage Rate¹	Total Respondent Costs
Researchers and representatives of disability advocacy organizations and provider associations	Scheduling Call Script A	1	\$50.99	\$50.99
State agency staff	Scheduling Call Script B	1	\$50.99	\$50.99
Researchers and representatives of disability advocacy organizations and provider associations	Interview A	10	\$50.99	\$509.90
State agency staff	Interview B	8	\$50.99	\$407.92
Total				\$1019.80
Information on subject matter experts' hourly wage rates gathered from the Bureau of Labor Statistics' website, and can be accessed at the following link: http://www.bls.gov/oes/current/oes119111.htm				

13. Estimates of Other Total Annual Cost Burden to Respondents or Record Keepers

There are no additional costs to the subject matter expert interview respondents. There are no costs other than their time to participate in the voluntary subject matter expert interview.

14. Annualized Cost to the Federal Government

It is expected that collecting and analyzing the data from the subject matter expert interviews will cost NCHS about \$30,000 in contractor costs (including labor and other direct costs) and \$8,000 in NCHS staff costs, for a total of about \$38,000.

15. Explanation for Program Changes or Adjustments

This is a generic IC. There are no program changes or adjustments.

16. Plans for Tabulation and Publication and Project Time Schedule

The subject matter expert interviews will be analyzed to identify findings on gaps and approaches to filling those gaps. Attention will be focused on identifying those long-term care services providers and services users that seem most promising for expansion of NSLTCP. The findings will be included in a report for internal use only by NCHS (not made public). That is, the information is for internal use only. Expected users of the subject matter expert interviews and report findings include staff of NCHS' Long-Term Care Statistics Branch and project staff for its contractor, RTI International. No other publications are currently planned.

Findings from the subject matter expert interviews will be used to inform future waves of NSLTCP. Any future design changes to NSLTCP that NCHS decides to pursue as a result of the subject matter expert findings could result in filling gaps and, therefore, providing more complete coverage of long-term care services providers and users. These design changes could, ultimately, produce more data on long-term care services. Expected users of such potential, future new data include, but are not limited to CDC's NCHS and its contractors; other Department of Health and Human Services (DHHS) agencies, such as the Office of the Assistant Secretary for Planning and Evaluation and the Agency for Healthcare Research and Quality; associations, such as LeadingAge (formerly the American Association of Homes and Services for the Aging), National Center for Assisted Living, American Seniors Housing Association, and Assisted Living Federation of America; universities; foundations; and other private sector organizations.

The subject matter expert interviews will begin within 2 weeks of clearance.

17. Reason(s) Display of OMB Expiration Date is Inappropriate

The display of the OMB expiration date is not inappropriate.

18. Exceptions to Certification for Paperwork Reduction Act Submissions

There are no exceptions to the certification.